



## ecology and environment, inc.

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International Specialists in the Environment

### MEMORANDUM

TO: Mark Matthews, EPA/RCRA

FROM: Patty Roberts, E & E/FIT

THRU: Otavio Silva, E & E/EPI Coordinator  
Philip Dula, E & E/FITOM

DATE: April 11, 1990

SUBJECT: The Ashland Chemical Company Potential Solid Waste Management Units (SWMUs) List.  
TDD# F-07-9003-005 PAN# FKS0285RA  
EPA ID No. KSD000203638

A preliminary review of the RCRA file reveals that the Ashland Chemical Company (formerly the Olin Water Services-Olin Corporation) generates hazardous wastes from the preparation of liquid and powder water treatment formulations. The Solid Waste Management Unit (SWMU) identified in the RCRA file is a waste drum storage area adjacent to the company's production plant. In a draft modified Part B permit the waste drum storage area is identified as being in a detached 3-sided building measuring approximately 31 by 26 feet, with a reinforced concrete slab floor and concrete block walls. The north side of the building is open and has a six foot wide ramp and is covered by a steel roof with clear panels for lighting. According to the draft permit the total number of drums stored in the facility is not to exceed 200-55 gallon drums. The wastes identified as being stored in this area include unusable raw materials, unusable or off-specification products, non-reusable rinse water, spent solvents and chromium-contaminated wood. The facility has been issued a final permit by the Kansas Department of Health and Environment (KDHE) for the storage of hazardous waste. The following waste are permitted for storage:

- Ignitable wastes, D001
- Corrosive wastes, D002
- Reactive wastes, D003
- Wastes that exhibit characteristics of EP toxicity for chromium, D007
- n-Butyl alcohol, U031
- 1,2 Dichlorobenzene, U070
- Ethylenebis(dithiocarbamic acid), salts and esters, U114
- Hydrazine, U133
- Pentachlorophenol, U242
- Methylene Chloride, F001



R00011071

RCRA Records Center

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The company is housed in two buildings which are separated by railroad tracks. One building serves as a shipping/receiving warehouse for raw materials (unformulated new chemicals) and finished products. The second building houses offices, laboratory facilities, mixing rooms, an incinerator, and batch blending tanks with related equipment. The company's hazardous waste drum storage area is adjacent to this building. Two storage tanks containing raw caustic material are located east of the building. A Visual Site Inspection (VSI) will allow evaluation of these site features and the identification of potential areas of concern (or SWMUs).

Please note that a final Part B RCRA hazardous waste facility permit application, SWMU questionnaire, and Notification of Hazardous Waste Activity form (8700-12) were not included in the EPA file. If available, I would like to review these forms/applications before the VSI on April 27, 1990. I am also enclosing a copy of the E & E/FIT letters of introduction for transmittal to the facility.

Should you have any questions or concerns, please give me a call at 432-9961.

attachments

cc: Pete Culver, EPA/RPO  
Ken Herstowski, EPA/RCRA EPI Coordinator